

**EXHIBIT B-2**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ARLIN M. ADAMS, Chapter 11 Trustee of  
the Post-Confirmation Bankruptcy Estates of  
CORAM HEALTHCARE CORPORATION,  
a Delaware Corporation, and of CORAM  
INC., a Delaware Corporation,

Case No. 04-1565 (SLR)

Plaintiff,

v.

DANIEL D. CROWLEY, DONALD J.  
AMARAL, WILLIAM J. CASEY, L. PETER  
SMITH, AND SANDRA L. SMOLEY,

Defendants.

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**DEFENDANT DANIEL D. CROWLEY'S INITIAL DISCLOSURES**

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Defendant Daniel D. Crowley, by and through his attorneys, discloses the following information pursuant to Fed. R. Civ. P. Rule 26(a)(1) and D. Del. L.R. 16.2:

This case is in its initial stage. Accordingly, the information provided and witnesses identified herein are based on what is presently known at this time. Mr. Crowley may discover additional witnesses that possess relevant information, or additional documents that may be relevant to the disputed facts in the case. Consequently, Mr. Crowley hereby reserves his right to supplement and/or amend these Initial Disclosures pursuant to Fed. R. Civ. P. Rule 26(e).

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## I. DISCLOSURE OF WITNESSES

Pursuant to Fed. R. Civ. P. 26(a)(1)(A), Mr. Crowley discloses that the following individuals may have discoverable information that Mr. Crowley may use to support his defenses:

Name, address and telephone Number:	Factual knowledge relevant to this case includes:
Daniel D. Crowley c/o Elliot R. Peters Keker & Van Nest LLP 710 Sansome Street San Francisco, CA 94111 (415) 391-5400	Mr. Crowley's work for Coram; Mr. Crowley's relationship with Cerberus; <sup>1</sup> disclosure of Mr. Crowley's relationship with Cerberus to the Coram Board of Directors and others; Mr. Crowley's work for other Cerberus affiliated entities; Coram's decision to file for bankruptcy; matters relating to the Coram's bankruptcy proceedings (hereinafter, the "Bankruptcy Cases") before the United States Bankruptcy Court for the District of District of Delaware (hereinafter, the "Bankruptcy Court"); Coram's First Plan of Reorganization; Coram's decision to hire Goldin Associates to investigate the alleged conflict of interest; Coram's Second Plan of Reorganization; the Trustee's and the Trustees' counsel's communications with Mr. Crowley and his counsel; the Trustee's decision to retain Mr. Crowley's services on behalf of Coram; the Trustee's negotiations with Mr. Crowley for an extension of his employment with Coram; the Trustee's consent to waiving claims against Mr. Crowley in the Transition Agreement and in conjunction with his Trustee's Motion for Authorization to Enter Into Termination and Employment Extension Agreement with Daniel D. Crowley ("Employment Extension Motion") in the Coram's bankruptcy proceedings; Mr. Feinberg's communications with Mr. Crowley during Coram's Bankruptcy Cases; Mr. Crowley's services on behalf of Cerberus and Cerberus affiliated entities including Winterland

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<sup>1</sup> Capitalized terms herein are defined as stated in the Trustee's Complaint, unless otherwise stated.

Name, address and telephone Number:	Factual knowledge relevant to this case includes:
Donald J. Amaral c/o Boris Feldman Wilson Sonsini Goodrich & Rosati 605 Page Mill Road Palo Alto, CA 94304-1050 (650) 493-9300	Mr. Crowley's work for Coram; negotiations and communications surrounding Mr. Crowley's employment agreement with Coram, and/or any amendments thereto; the value of Mr. Crowley's services on behalf of Coram; disclosure of Mr. Crowley's relationship with Cerberus to the Coram Board of Directors and others; Mr. Crowley's work for Cerberus affiliated entities; Coram's decision to file for bankruptcy; matters relating to Coram's Bankruptcy Cases; Coram's First Plan of Reorganization; Coram's decision to hire Goldin Associates to investigate the alleged conflict of interest; Coram's Second Plan of Reorganization
William J. Casey c/o Boris Feldman Wilson Sonsini Goodrich & Rosati 605 Page Mill Road Palo Alto, CA 94304-1050 (650) 493-9300	Mr. Crowley's work for Coram; negotiations and communications surrounding Mr. Crowley's employment agreement with Coram, and/or any amendments thereto; the value of Mr. Crowley's services on behalf of Coram; disclosure of Mr. Crowley's relationship with Cerberus to the Coram Board of Directors and others; Mr. Crowley's work for Cerberus affiliated entities; Coram's decision to file for bankruptcy; matters relating to Coram's Bankruptcy Cases; Coram's First Plan of Reorganization; Coram's decision to hire Goldin Associates to investigate the alleged conflict of interest; Coram's Second Plan of Reorganization
Peter Smith c/o Boris Feldman Wilson Sonsini Goodrich & Rosati 605 Page Mill Road Palo Alto, CA 94304-1050 (650) 493-9300	Mr. Crowley's work for Coram; negotiations and communications surrounding Mr. Crowley's employment agreement with Coram, and/or any amendments thereto; the value of Mr. Crowley's services on behalf of Coram; disclosure of Mr. Crowley's relationship with Cerberus to the Coram Board of Directors and others; Mr. Crowley's work for Cerberus affiliated entities; Coram's decision to file for bankruptcy; matters relating to Coram's Bankruptcy Cases; Coram's First Plan of Reorganization; Coram's decision to hire Goldin Associates to investigate the alleged conflict of interest; Coram's Second Plan of Reorganization

Name, address and telephone Number:	Factual knowledge relevant to this case includes:
Sandra L. Smoley c/o Boris Feldman Wilson Sonsini Goodrich & Rosati 605 Page Mill Road Palo Alto, CA 94304-1050 (650) 493-9300	Mr. Crowley's work for Coram; negotiations and communications surrounding Mr. Crowley's employment agreement with Coram, and/or any amendments thereto; the value of Mr. Crowley's services on behalf of Coram; disclosure of Mr. Crowley's relationship with Cerberus to the Coram Board of Directors and others; Mr. Crowley's work for Cerberus affiliated entities; Coram's decision to file for bankruptcy; matters relating to Coram's Bankruptcy Cases; Coram's First Plan of Reorganization; Coram's decision to hire Goldin Associates to investigate the alleged conflict of interest; Coram's Second Plan of Reorganization
Hon. Arlin M. Adams (Ret.) ("Trustee") c/o Barry E. Bressler Schnader Harrison Segal & Lewis LLP 1600 Market Street, Suite 3600 Philadelphia, PA 19103-7286 (215) 751-2000	All facts alleged in the Complaint; communications and negotiations between Mr. Crowley and his counsel and the Trustee and his counsel regarding the Transition Agreement and the Trustee's Employment Extension Motion; Mr. Crowley's work for Coram; the value of Mr. Crowley's services on behalf of Coram; matters relating to Coram's Bankruptcy Cases; the Trustee's plans for reorganization
Stephen A. Feinberg c/o Cerberus Partners LP 450 Park Avenue New York, NY 10022 (212) 891-2100	Mr. Crowley's relationship with Cerberus; negotiations and communications surrounding Mr. Crowley's employment agreement with Cerberus, and/or any amendments thereto; Mr. Crowley's services on behalf of Cerberus and Cerberus affiliated entities including Winterland; Mr. Crowley's work for Coram; negotiations and communications surrounding Mr. Crowley's employment agreement with Coram, and/or any amendments thereto; the value of Mr. Crowley's services on behalf of Coram; disclosure of Crowley's relationship with Cerberus to the Coram Board of Directors and others; Coram's decision to file for bankruptcy; matters relating to Coram's Bankruptcy Cases; Mr. Feinberg's communications with Mr. Crowley during Coram's Bankruptcy Cases

Name, address and telephone Number:	Factual knowledge relevant to this case includes:
Mark A. Neporent c/o Cerberus Partners LP 450 Park Avenue New York, NY 10022 (212) 891-2100	Mr. Crowley's relationship with Cerberus; negotiations and communications surrounding Mr. Crowley's employment agreement with Cerberus; Mr. Crowley's services on behalf of Cerberus and Cerberus affiliated entities including Winterland; disclosure of Crowley's relationship with Cerberus to the Coram Board of Directors and others; Mr. Crowley's work for Coram
Harrison Goldin c/o Kenneth H. Eckstein Kramer Levin Naftalis & Frankel LLP 919 Third Avenue New York, NY 10022 (212) 715-9100	The facts and circumstances investigated in preparing his Report and Updated Report as an Independent Restructuring Advisor submitted in Coram's Bankruptcy Cases
Scott Danitz <i>(address as of March 2003)</i> Home: 8886 S. Forrest Drive Highlands Ranch, CO 80126 (303) 683-9112	The valuation of Coram; the financial condition of Coram; Mr. Crowley's work for Coram; the value of Mr. Crowley's services on behalf of Coram; Coram's decision to file for bankruptcy; matters relating to Coram's Bankruptcy Cases; Coram's First Plan of Reorganization; Coram's decision to hire Goldin Associates to investigate the alleged conflict of interest; Coram's Second Plan of Reorganization
Scott N. Schrieber c/o Much Shelist Freed Denerberg Ament & Rubenstein, P.C. 191 North Wacker Drive, Suite 1800 Chicago, IL 60606 (312) 521-2000	Communications and negotiations between Mr. Crowley and his counsel and the Trustee and his counsel regarding the Transition Agreement and the Trustee's Employment Extension Motion
David M. Friedman c/o Kasowitz, Benson, Torres & Friedman LLP 1633 Broadway New York NY 10019-6799 (212) 506-1700	Matters relating to Coram's Bankruptcy Cases; Coram's First Plan of Reorganization; Coram's decision to hire Goldin Associates to investigate the alleged conflict of interest, Coram's Second Plan of Reorganization; discussions and negotiations regarding what was to be included in the Disclosure Statements filed by Coram in conjunction with the First Plan of Reorganization; the Trustee's alleged damages; discussions and negotiations regarding retaining Mr. Crowley as CEO of Coram after approval of First and Second Plans of Reorganization were denied

Name, address and telephone Number:	Factual knowledge relevant to this case includes:
Adam L. Schiff c/o Kasowitz, Benson, Torres & Friedman LLP 1633 Broadway New York NY 10019-6799. (212) 506-1700	Matters relating to Coram's Bankruptcy Cases; Coram's First Plan of Reorganization; Coram's decision to hire Goldin Associates to investigate the alleged conflict of interest, Coram's Second Plan of Reorganization; discussions and negotiations regarding what was to be included in the Disclosure Statements filed by Coram in conjunction with the First Plan of Reorganization; the Trustee's alleged damages; discussions and negotiations regarding retaining Mr. Crowley as CEO of Coram after approval of First and Second Plans of Reorganization were denied
Kurt Davis c/o Dynamic Healthcare Solutions, L.L.C. 400 Capitol Mall, Suite 1250 Sacramento, CA 95814 (916) 449-6056	Relationships of Coram, Mr. Crowley, and the Noteholders with Dynamic Healthcare Solutions, L.L.C. ("Dynamic"); the receipt and distribution of compensation received by Dynamic from Cerberus for services provided by Mr. Crowley; Mr. Crowley's work for Cerberus and Cerberus affiliated entities
Pam Herrera c/o Dynamic Healthcare Solutions, L.L.C. 400 Capitol Mall, Suite 1250 Sacramento, CA 95814 (916) 449-6056	Relationships of Coram, Mr. Crowley, and the Noteholders with Dynamic; the receipt and distribution of compensation received by Dynamic from Cerberus for services provided by Mr. Crowley; Mr. Crowley's work for Cerberus and Cerberus affiliated entities
Jerome J. Shestack c/o Wolf, Block, Schorr and Solis-Cohen 1650 Arch Street, 22 <sup>nd</sup> Floor Philadelphia, PA 19103	Investigation and alleged facts supporting the conclusion stated in the Expert Report of Jerome J. Shestack, Esquire of September 8, 2003
J. Scott Victor c/o SSG Capital Advisors, LLP 300 Barr Harbor Drive, Suite 420 W. Conshohocken, PA 19428	Matters relating to Coram's Bankruptcy Cases
Samuel Bemiss c/o Ewing Bemiss & Co. Riverfront Plaza, West Tower 901 East Byrd Street, Suite 1650 Richmond, Virginia 23219 (804) 780-1920	Matters relating to Coram's Bankruptcy Cases

Name, address and telephone Number:	Factual knowledge relevant to this case includes:
Richard F. Levy c/o Jenner & Block LLP One IBM Plaza Chicago, IL 60611 (312) 222-9350	Matters relating to Coram's Bankruptcy Cases
Donn Tice c/o Nano-Tex, LLC 5770 Shellmound Street Emeryville, CA 94608 (510) 420-3772	Mr. Crowley's services on behalf of Cerberus and Cerberus affiliated entities including Winterland
Kevin Genda c/o Cerberus Capital Management 299 Park Avenue New York, NY 10171 (212) 891-2100	Mr. Crowley's services on behalf of Cerberus and Cerberus affiliated entities including Winterland
Warren Feder c/o Stepping Stone Capital 126 East 56 <sup>th</sup> Street New York, NY 10022 (212) 421-4800	Mr. Crowley's services on behalf of Cerberus and Cerberus affiliated entities including Winterland
Allen Marabito 5899 Wedgewood Drive Granite Bay, CA 95746 (916) 797-0197	Mr. Crowley's work for Coram; the value of Mr. Crowley's services on behalf of Coram; disclosure of Mr. Crowley's relationship with Cerberus to the Coram Board of Directors and others; Mr. Crowley's work for Cerberus affiliated entities; Coram's decision to file for bankruptcy; matters relating to Coram's Bankruptcy Cases
Richard Fink <i>(address unknown)</i>	Mr. Crowley's work for Coram; negotiations and communications surrounding Mr. Crowley's employment agreement with Coram, and/or any amendments thereto; the value of Mr. Crowley's services on behalf of Coram; disclosure of Mr. Crowley's relationship with Cerberus to the Coram Board of Directors and others

Name, address and telephone Number:	Factual knowledge relevant to this case includes:
Frank Geiger c/o Coram 1675 Broadway #900 Denver, CO 80202 (303) 672-8880	Mr. Crowley's work for Coram; the value of Mr. Crowley's services on behalf of Coram; disclosure of Mr. Crowley's relationship with Cerberus to the Coram Board of Directors and others; Mr. Crowley's work for Cerberus affiliated entities; Coram's decision to file for bankruptcy; matters relating to Coram's Bankruptcy Cases
Gerald Reynolds <i>(address as of March 2003)</i> 3153 Soaring Eagle Lane Castle Rock, CO 80104 (303) 841-8562	Mr. Crowley's work for Coram; the value of Mr. Crowley's services on behalf of Coram; disclosure of Mr. Crowley's relationship with Cerberus to the Coram Board of Directors and others; Mr. Crowley's work for Cerberus affiliated entities; Coram's decision to file for bankruptcy; matters relating to Coram's Bankruptcy Cases
Vito Ponzio c/o Coram 1675 Broadway #900 Denver, CO 80202 (303)-672-8880	Mr. Crowley's work for Coram; the value of Mr. Crowley's services on behalf of Coram; disclosure of Mr. Crowley's relationship with Cerberus to the Coram Board of Directors and others; Mr. Crowley's work for Cerberus affiliated entities; Coram's decision to file for bankruptcy; matters relating to Coram's Bankruptcy Cases
Debbie Meyer <i>(address as of March 2003)</i> 1512 Larimer #23 Denver, CO 80202 (303) 725-9308 (cell)	Mr. Crowley's work for Coram; the value of Mr. Crowley's services on behalf of Coram; disclosure of Mr. Crowley's relationship with Cerberus to the Coram Board of Directors and others; Mr. Crowley's work for Cerberus affiliated entities; Coram's decision to file for bankruptcy; matters relating to Coram's Bankruptcy Cases
Michale Saracco <i>(address as of March 2003)</i> Home: 37 Verkade Drive Wayne, NJ 07470 (973) 812-5387	Mr. Crowley's work for Coram; the value of Mr. Crowley's services on behalf of Coram; disclosure of Mr. Crowley's relationship with Cerberus to the Coram Board of Directors and others; Mr. Crowley's work for Cerberus affiliated entities; Coram's decision to file for bankruptcy; matters relating to Coram's Bankruptcy Cases

Name, address and telephone Number:	Factual knowledge relevant to this case includes:
Wendy Simpson <i>(address as of April 2000)</i> c/o TLC Properties, Inc. 300 Esplanade Drive #1860 Oxnard, CA 93030 (805) 981-8655	Mr. Crowley's work for Coram; the value of Mr. Crowley's services on behalf of Coram; disclosure of Mr. Crowley's relationship with Cerberus to the Coram Board of Directors and others; the financial condition of Coram between March 1998 and March 2000
Alan B. Miller Weil Gotshal & Manges LLP 767 Fifth Ave New York, NY 10153 (212) 310-8000	Matters relating to Coram's Bankruptcy Cases
Eugene Tillman Reed Smith LLP 1301 K Street, N.W. Suite 1100 - East Tower Washington DC 20005 (202) 414-9244	Matters relating to Coram's Bankruptcy Cases; communications and decisionmaking process regarding disclosures of Mr. Crowley's relationship with Cerberus in regulatory filings
Eric A. Scroggins Levine Leichtman Capital Partners 335 North Maple Drive, Suite 90210 Beverly Hills, California 90210 (310) 275-5335	Matters relating to Coram's Bankruptcy Cases; financial condition and valuation of Coram
Arlyn Dozeman Ernst & Young 370 17th St., Suite 4300 Denver, CO 80202 (720) 931-4000	Matters relating to Coram's Bankruptcy Cases; the financial condition and valuation of Coram
Daniel R. Fischel Lexecon Inc. 332 South Michigan Ave. Chicago, Illinois 60604 (312) 322-0209	Matters relating to Coram's Bankruptcy Cases; Trustee's alleged damages; investigation and alleged facts supporting the conclusion stated in the "Report of Daniel R. Fischel Concerning Expert Testimony to be Given on Behalf of the Equity Committee" dated November 13, 2001 and in the "Report of Daniel R. Fischel dated September 3, 2003"
Daniel M. Lynn Deloitte & Touche 111 S Wacker Dr., Floor 17 Chicago, IL 60606 (312) 486-2917	Matters relating to Coram's Bankruptcy Cases; the financial condition and valuation of Coram

Name, address and telephone Number:	Factual knowledge relevant to this case includes:
Christina Morrison Deutsche Banc Alex Brown 1 South Street Baltimore, MD 21202 (410) 895-4569.	Matters relating to Coram's Bankruptcy Cases; the financial condition and valuation of Coram
Edward Mule SilverPoint Capital 2 Greenwich Plaza, 1 <sup>st</sup> Floor Greenwich, CT 06830 (203) 542-4010	Matters relating to Coram's Bankruptcy Cases; Crowley's relationship and communications with Cerberus and with the other Noteholders
M. Edward Stearns Foothill Capital Corp. 2450 Colorado Avenue, Suite 3000 West Santa Monica, CA 90404 (310) 453-7376	Matters relating to Coram's Bankruptcy Cases; Crowley's relationship and communications with Cerberus and with the other Noteholders
Barry E. Bressler Schnader Harrison Segal & Lewis LLP 1600 Market Street, Suite 3600 Philadelphia, PA 19103-7286 (215) 751-2000	Communications and negotiations between Mr. Crowley and his counsel and the Trustee and his counsel regarding the Transition Agreement and the Trustee's Employment Extension Motion
Michael Barrie Schnader Harrison Segal & Lewis LLP 1600 Market Street, Suite 3600 Philadelphia, PA 19103-7286 (215) 751-2000	Communications and negotiations between Mr. Crowley and his counsel and the Trustee and his counsel regarding the Transition Agreement and the Trustee's Employment Extension Motion
Wilbur Kipnes Schnader Harrison Segal & Lewis LLP 1600 Market Street, Suite 3600 Philadelphia, PA 19103-7286 (215) 751-2000	Communications and negotiations between Mr. Crowley and his counsel and the Trustee and his counsel regarding the Transition Agreement and the Trustee's Employment Extension Motion

## II. DOCUMENTS

Pursuant to the Federal Rules of Civil Procedure, Rule 26(a)(1)(B), Mr. Crowley lists the following categories of documents that he may use to support his claims:

1. All pleadings, filings, transcripts and records in Coram's Bankruptcy Cases.
2. Transcripts of all depositions taken of, or testimony given under oath by, the individuals identified in Section I *supra*.
3. Written correspondence between the parties.
4. Written correspondence between counsel for the parties.

5. Written correspondence among Mr. Crowley, Cerberus; and/ or the other Noteholders.
6. Written correspondence among counsel for the Trustee and counsel for the Noteholders.
7. Written correspondence between counsel for the Trustee and counsel for the Equity Committee.
8. Written correspondence between counsel for the Noteholders and counsel for the Equity Committee.
9. Mr. Crowley's contracts with Coram and Cerberus.
10. All Coram financial information for the two years before Mr. Crowley became CEO through the two years after his employment terminated as CEO. These documents are located at Coram's headquarters or are publicly available.
11. All Coram Board minutes for the two years before Mr. Crowley became CEO through the two years after his employment terminated as CEO. These documents are located at Coram's headquarters.
12. Deposition and court testimony of the Trustee given in connection with (i) the Trustee's Employment Extension Motion, and (b) the Trustee's Plan of Reorganization.
13. Trustee's Employment Extension Motion and all supporting and opposing pleadings filed in the Bankruptcy Court.
14. Monthly Reports prepared by Mr. Crowley and sent to the Trustee relating to Coram's financial performance.
15. Documents introduced into evidence at the confirmation hearing on Coram's First Joint Plan of Reorganization.
16. Report of Independent Restructuring Advisors, Goldin Associates, L.L.C.
17. Documents introduced into evidence at the confirmation hearing on Coram's Second Joint Plan of Reorganization.
18. Documents produced by the Equity Committee, the Noteholders and the Trustee in connection with the March 3, 2003 hearing before the Bankruptcy Court.
19. Documents introduced into evidence at the hearing before the Bankruptcy Court held on March 3, 2003.
20. Document relating to Mr. Crowley's employment at Coram including, but not limited to, his employment file, expense reimbursements, compensation documents and work product.
21. Transcripts of proceedings related to the Bankruptcy Cases in the Bankruptcy Court.
22. Documents of record in the Bankruptcy Court for the Bankruptcy Cases.

- 23. Documents produced by the Equity Committee, the Noteholders and the Trustee in connection with the hearings on Confirmation of the Trustee's Second Amended Joint Plan of Reorganization and the Second Amended Plan of Reorganization of the Equity Committee.
- 24. Opinions of the Bankruptcy Court in the Bankruptcy Cases.
- 25. The expert reports filed in the Bankruptcy Cases and documents identified in or attached to such expert reports.
- 26. Financial data relating to Coram.
- 27. Coram's filings of with the Securities and Exchange Commission.
- 28. PowerPoint presentations prepared by Mr. Crowley or employees of Coram.
- 29. Documents otherwise relating to Mr. Crowley's employment for Coram and for Cerberus.

Upon information and belief, the Trustee already has access to, or possession of, all of the foregoing documents. Pursuant to Fed. R. Civ. P. Rule26(e), Mr. Crowley reserves the right to supplement, modify and/or amend the foregoing list of documents as investigation and discovery continue.

### III. INSURANCE AGREEMENTS

Pursuant to the Federal Rules of Civil Procedure, Rule 26(a)(1)(D), Mr. Crowley discloses that he is aware of the following insurance policies under which insurance carriers may be liable to satisfy part or all of any judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy any judgment in this action:

#### A. For the time period from January 27, 2001 to January 27, 2002:

Carrier & Policy Number	Carrier Contact
Genesis Insurance Company Policy No. YXBOO1625A.  (This policy is the subject of a declaratory judgment action filed by Genesis Insurance Company in the United States District Court for the District of Colorado, <i>Genesis Insurance Company v. Daniel D. Crowley et al</i> , Case No. 05-DV-00335-WDM-PAC)	Jason P. Cronic Wiley, Rein & Fielding LLP 1776 K Street NW Washington, DC 20006 (202) 719-7175

Carrier & Policy Number	Carrier Contact
Executive Risk Specialty Insurance Company Policy No.: 752-152504-99	Linda Quartermain Senior Claims Attorney Executive Risk Specialty Insurance Company Chubb Specialty Insurance 82 Hopmeadow Street P.O. Box 2002 Simsbury, CT 06070-7683
RLI Insurance Company Policy No.: EPG0001054	Amy E. Johnson Senior Claim Advisor RLI Insurance Company 525 W. Van Buren Street Congress Center, Suite 350 Chicago, IL 60607-3823 (312) 360-1566
Zurich American Insurance Company Policy No.: DOC 3636937 00	Zurich American Insurance Company Attn: Executive Assurance Dept. One Liberty Plaza, 30 <sup>th</sup> Floor New York, NY 10006
The Hartford, the Twin City Fire Insurance Co. (previously Reliance Insurance Company) Policy Nos.: NDA 0160273-99 NDA 0160273-00	The Hartford Attn: Claims Division Hartford Plaza Hartford, CT 06115
Gulf Insurance Group Policy No.: GAO491129	Andre E. Harlfinger, Director Gulf Insurance Group One State Street Plaza 10 <sup>th</sup> Floor New York, NY 10004 (917) 320-7371
Royal & Sun Alliance Policy No.: P SF001588	Royal & Sun Alliance Financial Products Claims Division 9300 Arrowpoint Blvd. Charlotte, NC 28273-8135 (704) 522-2000

B. For the time period from January 27, 2001 to January 27, 2002:

Carrier & Policy Number	Carrier Contact
AIG National Union Fire Insurance Co. of Pittsburgh, PA  Policy No.: 872-47-42	Dean Constantine AIG Technical Services, Inc. National Union Fire Insurance Company of Pittsburgh, PA 175 Water Street, 9 <sup>th</sup> Floor New York, NY 10038
RLI Insurance Company Policy No.: EPG0001155	Robert MacAneney RLI Insurance Company 1384 Broadway, 21 <sup>st</sup> Floor New York, N.Y 10018
The Hartford Twin City Fire Insurance Co. Policy No.: NDA 0160273-01	The Hartford Attn: Claims Division Hartford Plaza Hartford, CT 06115
Greenwich Insurance Co. XL Specialty Insurance Co.  Policy No.: ELU 8216801	John Burrows Executive Liability Underwriters One Financial Plaza, 10 <sup>th</sup> Floor 755 Main Street Hartford, CT 06103

Upon information and belief, the Trustee already has access to, or possession of, all of these insurance policies.

Dated: May 12, 2006

Respectfully submitted,

JOHN W. KEKER  
ELLIOT R. PETERS  
LAURIE CARR MIMS  
KEKER & VAN NEST, LLP  
710 Sansome Street  
San Francisco, CA 94111  
Tel: (415) 391-5400  
Email: [jkeker@kvn.com](mailto:jkeker@kvn.com)  
Email: [epeters@kvn.com](mailto:epeters@kvn.com)  
Email: [lmims@kvn.com](mailto:lmims@kvn.com)

Attorneys for Defendant  
DANIEL D. CROWLEY

**CERTIFICATE OF SERVICE**

I, Laurie Carr Mims, certify that I am not less than 18 years of age and that service of Defendant Daniel D. Crowley's Initial Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) and D. Del. L.R. 16.2 was made on May 12, 2006, upon:

Richard A. Barkasy  
Michael J. Barrie  
Barry E. Bressler  
Schnader Harrison Segal & Lewis LLP  
824 Market Street, Suite 1001  
Wilmington, DE 19801

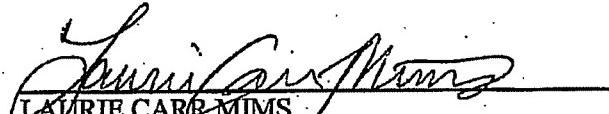
*(Via Electronic Transmission and First Class Mail)*

Colin P. Bissell, Esq.  
Young Conaway Stargatt & Taylor  
The Brandywine Building  
1000 West Street, 17th Floor  
Wilmington, DE 19801

*(Via Electronic Transmission and First Class Mail)*

I certify the foregoing is true and correct under penalty of perjury.

Dated: May 12, 2006

  
LAURIE CARR MIMS